

DATE OUT: 24/NOV/08

SUBJECT: PRODUCT CHEMISTRY REVIEW OF: TGAI []; MUP []; EUP [x]

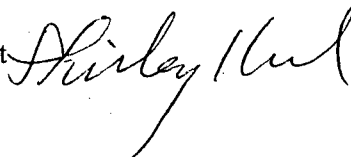
BARCODE NO.: 357353 REG./FILE SYMBOL NO.: 67702-1

PRODUCT NAME: NEU1140F RTU Copper Soap

MRID NOS.: 475383-01, 446515-01, 439503-01, -03

COMPANY NAME: W. Neudorff GmbH KG ACTION CODE: 674

FROM: Shirley H. Keel, Environmental Protection Specialist
Product Chemistry Team
PRB/SRRD (7508P)



TO: Bonnie Adler, CRM
Product Reregistration Branch
Special Review and Reregistration Division (7508P)

INTRODUCTION:

A Reregistration Eligibility Decision (RED) entitled *Coppers*, including Case Nos. 0636, 0649, 4025 and 4026, was issued in July 2006 for the Copper Compounds. This RED included 34 copper compounds of which 13 were indicated as having been cancelled. According to the *Coppers* RED, the generic database supporting the reregistration of Copper Compounds for their current uses has been reviewed and found to be substantially complete.

In the 8-month response to the *Coppers* RED, in support of the reregistration of NEU1140F RTU Copper Soap, EPA Reg. No. 67702-1, the registrant submitted Confidential Statements of Formula (CSF), one basic and two alternate formulations, dated 9/26/01; a draft label received by EPA on 9/18/08; and product chemistry data in MRID numbers 475383-01, 446515-01, 439503-01 and -03.

FINDINGS:

1. EPA Reg. No. 67702-1 is an end-use product that contains the active ingredient Copper octanoate at a label claim nominal concentration of 0.08%.
2. The CSFs for the basic and alternate formulations, dated 9/26/01, are acceptable. The nominal concentration of the active ingredient agrees with that on the draft label, meeting the requirements of PR Notice 91-2. The upper and lower certified limits for the active and inert ingredients are acceptable as per 40 CFR 158.175(b)(2). All ingredients listed in the CSFs are cleared for use in pesticide formulations.
3. The product chemistry data in MRID Nos. 439503-01 and -03, which pertain to Description of Formulation Process, Discussion of Formation of Impurities, Physical State, Flammability, Explodability, Storage Stability, Miscibility, Corrosion Characteristics, Dielectric Breakdown Voltage, pH, Viscosity, and Density were previously submitted to the Registration Division (RD) in connection with the registration of the subject product, and were reviewed by Alfred Smith on 9/11/96 under Barcode No. D225878. PRB/SRRD concurs with RD's review and concludes that these data are acceptable to support the reregistration of the subject product.

4. The product chemistry data in MRID Nos. 475383-01, 446515-01 and 439503-03 satisfy the requirements of the Guidelines 830.1600, 830.1800, 830.6302 and 830.6304, which pertain to Description of Materials Used to Produce the Product, Enforcement Analytical Method, Color and Odor.
5. The product chemistry statements of the draft label are acceptable. The Ingredient statement is in compliance with the requirements of 40 CFR 156.10(g) and PR Notice 91-2. There are no physical/chemical hazards present in the product that will trigger the Physical or Chemical Hazards subheading.
6. The Storage and Disposal section of the draft label needs to be revised.
 - The subject product is for both household and commercial use. Per PR Notice 83-3, for commercial use, the product label must contain the statement, "Do not contaminate water, food, or feed by storage or disposal." The statement should be placed under the heading **STORAGE AND DISPOSAL**.
 - The subheading "Storage" should be changed to **Pesticide Storage**.
 - A subheading **Pesticide Disposal** must be added. Under the subheading **Pesticide Disposal** the label must contain the following text:

"Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste representative at the nearest EPA Regional Office for guidance."
 - The subheading "Disposal" should be changed to **Container Disposal**.

The above recommendations to revise the "Storage and Disposal" section of the draft label should be addressed during the label review.

CONCLUSIONS:

The registrant has satisfied the product chemistry data requirements for the reregistration of EPA Reg. No. 67702-1.

Product Chemistry Data**Subgroup A: Guidelines Series 830.1550 - 830.1800 (40 CFR §158.320 - 158.355)****Product Identity, Composition, and Analysis**

Guideline Reference No. (GRN)/ Title 830	40 CFR §	MRID Number	Data Fulfilled
830.1550 Product Identity and Composition	158.320	CSF	Y
830.1600 Description of Materials Used to Produce the Product	158.325	446515-01(MSDS) & CSF	Y
830.1750 Certified Limits	158.350	CSF	Y
830.1800 Enforcement Analytical Method	158.355	439503-03	Y

Subgroup B: Series 830.6302 - 7950 (40 CFR §158.310)**Physical and Chemical Properties**

GUIDELINE REFERENCE NO. (GRN)/ TITLE 830	VALUE OR QUALITATIVE DESCRIPTION	MRID Number	Data Fulfilled
.6302 Color	Blue (Munsell 2.25B7.25/6.5)	475383-01	Y
.6304 Odor	Faint soapy odor	475383-01	Y
.6314 Oxidation/Reduction: Chemical Incompatibility	Does not contain any oxidizing or reducing agents.		W

Explanations: Y = Requirement fulfilled; N = Requirement not fulfilled; N/A = Not applicable; G = Data gap; U = Upgradable; I = Incomplete or in progress; W = Waived.

830-1800 Enforcement Analytical Method

The copper content in NEU1140F RTU Copper Soap is determined by Atomic Absorption Method (in MRID No. 439503-03). The method is an acid digestion procedure used to prepare aqueous sample for analysis by flame atomic absorption spectroscopy. The operation conditions are set as follows. Instruments: Copper hollow cathode lamp, air-acetylene oxidizing flame burner; Wavelength: 324.7 nm; Reagents: ASTM Type II water and 2N nitric acid (HNO₃).